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**Subject:** Additional questions on neonic labels  
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**Attachments:** [image002.png](#)

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Meredith:

These are the additional questions mentioned by Clive Hander in his message to you yesterday. We anticipate that the answers are straightforward, and should not require a great investment in time on the part of EPA personnel.

- How can we put the entire bee box on the small label of a consumer product, so that it is readable?
- For labels containing only foliar uses for plants that are not bee attractive (such as turf grass uses including sod farms), can the registrant exclude statement number two?
- Some labels contain uses for both agricultural crops and non-ag sites. To be consistent with the first two "DIRECTIONS FOR USE" statements, the third statement should begin with "FOR NON-AGRICULTURAL USES," rather than with "Non-Agricultural Products."
- The main pollinator box contains the statement: "Look for the bee hazard icon in the Directions for Use for each application site for specific use restrictions and instructions to protect bees and other insect pollinators." However, the Agency has discouraged registrants from including multiple bee icons among the use directions on the label. Will this lead to confusion for users? If the user finds no bee hazard icons among the Directions for Use or no icon for a particular use, will he assume that the specific pollinator instructions do not apply?
- For labels with varied uses, is the proposed use of referral statements as indicated below acceptable? (from Bayer proposal)
  - 1) Add bee icon to impacted uses – foliar outdoor application – in accordance with instruction from the pollinator protection box which stated:



Look for the bee hazard icon in the Directions for Use for each application site for specific use restrictions and instructions to protect bees and other insect pollinators.

- 2) Because the added Pollinator language is placed directly under the "Directions for Use" heading, giving the impression all uses are impacted, two referral statements are proposed to be added –i.e., to prevent confusion and to make clear to end-users and State Enforcement agents how the pollinator protection directions are to be used.

The two referral statements are:

- (a) For placement immediately below the “Directions for Use” heading and above the #2 and/or #3 Pollinator language statements, to refer the end-user to the use site bee icon:

**““FOLLOW THESE ADDITIONAL APPLICATION RESTRICTIONS FOR USE PATTERNS  
MARKED WITH THE BEE HAZARD ICON”**

- (b) second referral (e.g. for placement in the foliar application to outdoor ornamentals DFU box with bee icon) – to refer end-user to the pollinator restrictions

**“Follow application restrictions for Non-Agricultural Products indicated above to protect bees and other insect pollinators.**

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